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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Document Electronically Filed

Master Docket No.

3:12-cv-01893-MAS-TJB

IN RE NEW JERSEY TAX SALES CERTIFICATES ANTITRUST LITIGATION DEFENDANT MICHAEL

: MASTELLONE'S

: NOTICE OF MOTION

: FOR A STAY

: Oral Argument Requested

To:

LITE DEPALMA GREENBERG, LLC

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HAGENS BERMAN SOBOL SHAPIRO LLP Jason A. Zweig (admitted pro hac vice) One Penn Plaza, 36th Floor New York, NY 10119 PLEASE TAKE NOTICE that on June 2, 2014 or as soon thereafter as counsel may be heard, the undersigned counsel for Defendant Michael Mastellone will move before the Honorable Michael A. Shipp, United States District Court Judge, in and for the District of New Jersey at 402 East State Street, Trenton, New Jersey 08608 for an Order staying the action until after Defendant is sentenced on criminal charges arising from his guilty plea in <u>United States v. Michael Mastellone</u>, 2:13-cr-00643(DMC) (D.N.J.) to a one count Information charging a violation of 15 U.S.C. § 1, a Sherman Act Conspiracy, arising out of the same events alleged in this action.

PLEASE TAKE FURTHER NOTICE that, in support of this motion,

Defendant relies on the accompanying Memorandum of Law of In Support of Defendant

Michael Mastellone's Motion for a Stay and the Certification of Gary L. Cutler In

Support of Defendant Michael Mastellone's Motion for a Stay.

Dated: March 14, 2014 GARY L. CUTLER, P.C.

By: s/ Gary L. Cutler
Gary L. Cutler

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